



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SPN/MKM/BDM  
F. # 2015R00747

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March 20, 2020

FILED BY ECF

Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: In re Forfeiture Ancillary Proceeding (Datisa Account)  
Criminal Docket No. 15-252 (PKC)

Dear Judge Chen:

The government writes to respectfully request the suspension of all briefing deadlines and the cancellation or adjournment of the conference scheduled for April 20, 2020 in connection with the above-captioned forfeiture ancillary proceeding involving funds on deposit in Bank Hapoalim account number CH040828170441801000U held in the name of Datisa S.A. and all proceeds traceable thereto (the "Datisa Account").

On or about February 20, 2020, Full Play Group S.A. ("Full Play"), through its U.S. counsel, filed a Verified Petition asserting an interest in the Datisa Account, a Motion to Stay Forfeiture Proceedings, and related documents (collectively, the "Petition"). See ECF Dkt. Nos. 1309 and 1310. By Order entered on February 27, 2020, the Court directed that the government respond to the Petition by March 27, 2020 and that Full Play file any reply by April 10, 2020. In addition, the Court scheduled a conference on the Petition for April 20, 2020 at 11:00am.

On or about March 13, 2020, the government and Full Play, together with other interested entities, entered into a Stipulation of Settlement that, among other things, fully resolved the issues raised in the Petition on terms summarized in part in the government's letter to the Court dated March 17, 2020, in which it and the parties to the stipulated settlement requested entry of a proposed Partial Final Order of Forfeiture. See ECF Dkt. No. 1317.

Accordingly, the government, with the consent of Full Play, respectfully requests suspension of the current briefing deadlines and cancellation or adjournment sine die of the conference scheduled for April 20, 2020.

Respectfully submitted,

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cc: Counsel of Record (by ECF)